#### ETHYL CORPORATION

March 21, 1974



ETHYL TOWER 451 FLORIDA BATON ROUGE, LA. 70801

Mr. Arthur W. Busch Regional Administrator Environmental Protection Agency 1600 Patterson Street, Suite 1100 Dallas, Texas 75201

Ref. Ocean Dumping Permit 730D009A General Condition No. 10

Dear Mr. Busch:

Pursuant to instructions in Permit 730D009A this is to report the information as required in General Condition No. 10 of the Permit for dumpings that were initiated during the three month period ending February 1974. This supplements data furnished by our letter dated December 14, 1973 and completes information concerning disposals as covered by Permit 730D009A.

- 10a Information in the records to be kept pursuant to Paragraph 9 of the General Conditions as follows:
  - 9 a. The material is a waste sodium-calcium sludge loaded into drums for disposal. The contents are solid metallic sodium, metallic calcium and oxides of these metals plus sodium and calcium chlorides. Sodium chloride is used as fill material added first to the bottom of the containing 55 gallon drum before the addition of the waste sodium calcium sludge and then to the top. The sodium chloride fills the void spaces and provides added weight to ensure sinking of the drum. Analyses are listed in Exhibit A under 9a attached.
  - 9 b. The precise times, dates and locations of dumping are listed in Exhibit A under 9b attached.
  - 9 c. No information was noted relative to the assessment of the impact of permitted dumping activities on the marine environment or human health or welfare.
- 10b A summary of the 48 hour reports required by Paragraph 7 of the General Conditions is attached as Exhibit B.

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Reports required in the Special Conditions have been submitted and listed in our previous six month summary dated November 14, 1973.

Very truly yours,

M. J. Voorhies, Jr., Manager Production Scheduling and Distribution

By: N. B. Brodford
H. B. Bradford

HBB:sak Attach.

## EXHIBIT A

### 9a Description of the Sodium-Calcium Sludge Chemical Analysis

Trip No. Sodium (in Metal and Oxides) Calcium (in Metal and Oxides) Sodium and Calcium Chloride Oxygen Content in Oxides	174 No. 7 67.3% 7.4% 19.5% 5.8%	274 No. 8 64.1% 11.4% 19.7% 4.8%
9b Time, Date and Location of Dumping		
Commenced dumping - Date Local Time (hours Central Daylight) Latitude Longitude	1/19/74 835 28° 16 <sup>11</sup> 89° 28 <sup>11</sup>	2/3/74 840 28 12 7 89 21
Ceased Dumping Local Time (hours Central Daylight) Latitude Longitude	1/19/74 1435 28 17 <sup>1</sup> 89 19 <sup>21</sup>	2/3/74 1425 28 19' 89 22'
Mid Point Dumping when operation extended over 6 hours Latitude Longitude	6 hrs. 5 mins. 28° 4' 89° 22'	5 hrs. 45 mins.

#### EXHIBIT B

A Summary of the  $48\ \text{hour}$  Reports as Required by Paragraph 7 of the General Conditions

Trip No. Total Drums Total Weight (lbs.)  Chemical Analysis	174 No. 7 300 346,500	274 No. 8 685 339,075
Total Sodium (in Metal and Oxides) Total Calcium (in Metal and Oxides) Sodium and Calcium Chlorides Oxygen Content in Oxides Copper	67.3% 7.4% 19.5% 5.8%1.44 ppm	64.1% 11.4% 19.7% 4.8%
Total %	100	100
Contents		
Sodium as Metal (pounds) Calcium as Metal (pounds) Sodium and Calcium Chloride (pounds) Oxygen in Oxides (pounds) Copper (pounds)	223, 194 25, 641 67, 567 20, 097 0, 50	217, 347 38, 655 66, 797 16, 276 0, 5
Total (pounds)	346,500	399,075
Trip No.  Commenced Dumping	174 No. 7	274 No. 8
Date Greenwich meantime (hours) Latitude Longitude	1/19/74 1335 28 16 1 89 28	2/3/74 1340 28 12 89 21
Ceased Dumping		
Date Greenwich meantime (hours) Latitude Longitude	1/19/74 1935 28° 17' 89° 19"	2/3/74 1925 28 19 89 22 1

#### (Exhibit B Continued)

# Mid Point when operation extended over a 6 hour period Latitude 28° 4' 2 Longitude 89° 22' 2

Tug Used	Jim Lytal	Jim Lytal
Barge Used	Magnolia I	Magnolia I
Date Departed Baton Rouge	1-8-74 <sup>1</sup>	1/31/74
Date Returned Lockport	1-20-741	2/4/74

Drums disposed of on Trip 7 left Baton Rouge on January 8, 1974 but were delayed due to bad weather and were dumped on January 19, 1974.

<sup>&</sup>lt;sup>2</sup> Trip 8 required 5 hours and 45 minutes.